

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

EPIC GAMES, INC.

Plaintiff, Counter-defendant  
v.

APPLE INC.,

Defendant, Counterclaimant

Case No. 4:20-cv-05640-YGR

**[PROPOSED] ORDER RE: APPLE INC.'S  
ADMINISTRATIVE MOTION TO SEAL**

The Honorable Thomas S. Hixson

Pursuant to Civil Local Rule 79-5, Apple Inc. (“Apple”) has filed an Administrative Motion to Seal (the “Motion”). In support, Apple filed the accompanying declaration of Mark A. Perry.

Having considered the Motion, all associated declarations, exhibits, and any argument of counsel, and for good cause appearing:

**IT IS HEREBY ORDERED** that Apple’s request, consistent with the designations in the Administrative Motion, is **GRANTED**.

Accordingly,

(1) The public shall only have access to the version of the partially sealed document sought to be sealed by the Motion in which portions of the following sections have been redacted:

Portion of Document Sought to be Sealed	Document Title	Reason to Seal
Page 1, paragraph 3, beginning after “South Korea” and ending before “By way of example ...”	Joint Statement of Discovery Disputes – Relevance (“Relevance”)	Reflects non-public Apple project codenames.
Page 1, first bullet, beginning after “‘Wisconsin’ project,” and ending before “(APL-EG 10679997.)”	Relevance	Reflects non-public information regarding Apple’s compliance with foreign regulations.
Page 1, second bullet, beginning after “2024 state that,” and ending before “(APL-EG 10678998).”	Relevance	Reflects non-public information regarding Apple’s internal projects and codenames.
Pages 1–2, third bullet, beginning after “would have,” and ending before “(APL-EG 10676613)”	Relevance	Reflects non-public information regarding Apple’s internal projects and codenames.
Page 2, fourth bullet, beginning after “productions thus far,” and ending before “On May 31, 2024 ...”	Relevance	Reflects non-public information regarding Apple’s internal projects and codenames.
Page 1, paragraph 2, number (2)	Joint Statement of Discovery Disputes – Search Terms (“Search Terms”)	Reflects non-public Apple project codenames.
Page 1, note 2	Search Terms	Reflects non-public information regarding Apple’s internal projects and codenames.
Page 1, note 3	Search Terms	Reflects non-public Apple project codenames.
Page 4, last paragraph,	Search Terms	Reflects non-public Apple

beginning after “‘DMA’ and” and ending before “search terms”		project codenames.
Page 4, beginning after “Apple, and” and ending before “ <i>After</i> implementation”	Search Terms	Reflects non-public information regarding Apple’s internal projects and codenames.
Page 5, first paragraph, beginning after “Because DMA and” and ending before “have no nexus”	Search Terms	Reflects non-public Apple project codenames.
Page 5, second indented line, before “As noted, Epic rejected”	Search Terms	Reflects non-public Apple project codenames.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2024

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The Honorable Thomas S. Hixson  
United States District Court Magistrate Judge